

STEPHANIE M. HINDS (CABN 154284)
Acting United States Attorney

HALLIE HOFFMAN (CABN 210020)
Chief, Criminal Division

MOLLY K. PRIEDEMAN (CABN 302096)
Assistant United States Attorney

450 Golden Gate Avenue, Box 36055
San Francisco, California 94102-3495
Telephone: (415) 436-7332
FAX: (415) 436-7234
molly.priedeman@usdoj.gov

Attorneys for United States of America

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

UNITED STATES OF AMERICA,)	NO. CR 20-000469 HSG
)	
Plaintiff,)	STIPULATION AND ORDER EXCLUDING TIME
)	UNDER THE SPEEDY TRIAL ACT
v.)	
)	
ANGEL GABRIEL RAMIREZ,)	
)	
Defendant.)	

A change of plea hearing is scheduled in this case for March 31, 2021. For the reasons stated on the record on March 8, 2021, counsel for the United States and counsel for the defendant, Angel Gabriel Ramirez, jointly stipulate and request that time be excluded under the Speedy Trial Act from March 8, 2021 to March 31, 2021.

The government and counsel for the defendant have agreed that time be excluded under Federal Rule of Criminal Procedure 5.1 and the Speedy Trial Act so that defense counsel can continue to prepare, including by reviewing discovery produced by the government and discussing a proposed resolution. For these reasons, the parties stipulate and agree that excluding time until March 31, 2021, will allow for the effective preparation of counsel. *See* 18 U.S.C. § 3161(h)(7)(B)(iv). The parties

1 further stipulate and agree that the ends of justice served by excluding time from March 8, 2021 to
2 March 31, 2021 from computation under the Speedy Trial Act outweigh the best interests of the public
3 and the defendant in a speedy trial. 18 U.S.C. §§ 3161(h)(7)(A), (B)(iv).

4 The undersigned Assistant United States Attorney certifies that she has obtained approval from
5 counsel for the defendant to file this stipulation, request, and proposed order.

6
7 IT IS SO STIPULATED.

8
9 DATED: March 9, 2021

/s/ Molly K. Priedeman
MOLLY K. PRIEDEMAN
Assistant United States Attorney

10
11
12 DATED: March 9, 2021


/s/ Jerome Matthews
JEROME MATTHEWS
Attorney for the Defendant

ORDER

Based upon the representations of counsel and for good cause shown, the Court finds that failing to exclude the time from March 8, 2021 to March 31, 2021 would unreasonably deny defense counsel and the defendant the reasonable time necessary for effective preparation and continuity of counsel, taking into account the exercise of due diligence. 18 U.S.C. §3161(h)(7)(B)(iv). The Court further finds that the ends of justice served by excluding the time from March 8, 2021 to March 31, 2021 from computation under the Speedy Trial Act outweighs the best interests of the public and the defendant in a speedy trial. Therefore, and with the consent of the parties, IT IS HEREBY ORDERED that the time from March 8, 2021 to March 31, 2021 shall be excluded from computation under the Speedy Trial Act. 18 U.S.C. §§ 3161(h)(7)(A), (B)(iv).

IT IS SO ORDERED.

DATED: 3/10/2021


THE HON. HAYWOOD S. GILLIAM, JR.
United States District Judge